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*Attorney for Defendant, Jan Rouven Fuechtener*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAN ROUVEN FUECHTENER,

Defendant.

CASE NO.: 2:16-CR-100-GMN-CWH

**STIPULATION TO CONTINUE  
SENTENCING HEARING AND  
RESPONSE DEADLINES**

IT IS HEREBY STIPULATED AND AGREED, by and between Elham Roohani and Lisa C. Cartier-Giroux, Assistant United States Attorneys, counsel for the United States of America, and Karen A. Connolly, counsel for Defendant JAN ROUVEN FUECHTENER, that the sentencing hearing currently scheduled for August 18, 2017, at the hour of 9:00a.m., be vacated and continued for approximately 21 days.

This Stipulation is entered into for the following reasons:

1. The parties agree to the continuance for the following reasons: The Government needs more time to respond to Defendant's Motion to Withdraw Plea since Honorable Gloria Navarro recently signed the waiver of the attorney client privilege on July 20, 2017; Ben Durham, one of Rouven's prior attorneys, is out of town until August; and Karen A. Connolly, attorney for Defendant is out of the jurisdiction from July 28 - August 14, 2017.
2. The additional time requested herein is not sought for purposes of delay.
3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

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4. This is the fourth request to continue the sentencing date and response deadlines.

DATED this 26<sup>th</sup> day of July, 2017.

KAREN A. CONNOLLY, LTD.

DANIEL G. BOGDEN  
United States of America

/s/ Karen A. Connolly  
KAREN A. CONNOLLY  
Counsel for Jan Rouven Fuechtener

/s/ Elham Roohani  
ELHAM ROOHANI  
LISA C. CARTIER-GIROUX  
Assistant United States Attorneys  
Counsel for Plaintiff

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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 JAN ROUVEN FUECHTENER,

7 Defendant.

CASE NO.: 2:16-cr-100-GMN-CWH

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

8 **FINDINGS OF FACT**

9 Based on the Stipulation of counsel, and good cause appearing therefore, the Court finds that:

10 1. The parties agree to the continuance for the following reasons: The Government  
11 needs more time to respond to Defendant's Motion to Withdraw Plea since Honorable Gloria  
12 Navarro recently signed the waiver of the attorney client privilege on July 20, 2017; Ben  
13 Durham, one of Rouven's prior attorneys, is out of town until August; and Karen A.  
14 Connolly, attorney for Defendant is out of the jurisdiction from July 28 - August 14, 2017.

15 2. The additional time requested herein is not sought for purposes of delay.

16 3. Additionally, denial of this request for continuance could result in a miscarriage of  
17 justice.

18 4. This is the third request to continue the sentencing date.

19 For all of the above-stated reasons, the ends of justice would best be served by a continuance  
20 of the sentencing and response deadlines.

21 **CONCLUSIONS OF LAW**

22 The ends of justice served by granting said continuance outweigh the best interest of the  
23 public and the defendant in a speedy trial, since the failure to grant said continuance would be  
24 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the  
25 opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking  
26 into account the exercise of due diligence.

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1 The continuance sought herein is excusable under the Speedy Trial Act, title 18, United States  
2 Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section  
3 3161(h)(7)(B(i), (iv).

4 **ORDER**

5 IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled for August  
6 18, 2017, at the hour of 9:00 a.m., be vacated and set continued to \_\_\_\_\_ at  
7 the hour of \_\_\_\_\_.m.

8 IT IS THEREFORE ORDERED that the response to Defendant's Motion to Withdraw Plea  
9 is due August 11, 2017, and Defendant's reply is due August 18, 2017.

10 DATED this \_\_\_\_\_ day of July 2017.

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12 UNITED STATES DISTRICT JUDGE  
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